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VIA MESSENGER

Jeff Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION

DEC 27 AM 8: 03

GENERAL

Re: MUR 7169, MUR 7170, MUR 7171, MUR 7172, MUR 7173, MUR 7174, MUR 7175, MUR 7176, MUR 7177, MUR 7178, MUR 7179, MUR 7182, MUR 7187, MUR 7188

Dear Mr. Jordan:

On behalf of Hillary for America and Jose H. Villarreal in his official capacity as Treasurer ("Respondents"), we submit this letter in response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT") in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 (the "Complaints"), alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), or Federal Election Commission ("FEC" or "Commission") regulations. The Complaints fail to include any facts, which, if proven true, would constitute a violation of the Act.<sup>1</sup> The Commission should accordingly dismiss the Complaints and take no further action.

FACT filed fourteen different complaints all stemming from a series of advertisements paid for by the DCCC, the campaigns of several candidates for U.S. House in the general election in 2016, and in the case of MUR 7177, the Colorado Democratic Party. Each complaint ended with a sweeping allegation that "in light of the close and ongoing coordination occurring between the DCCC and Hillary for America," the advertisements at issue must have been coordinated with Respondents, resulting in an in-kind contribution.<sup>2</sup> In a footnote, each complaint then cited the Commission's three-prong test for party coordinated communications, noting that the advertisement at issue "satisfies one or more conduct standards (material involvement and substantial discussion)."<sup>3</sup> Notably absent from each complaint is even a single fact suggesting that Respondents coordinated these advertisements with the DCCC, the Colorado Democratic Party or any of the named campaign committees. And in fact, no such coordination occurred.

<sup>1</sup> See 11 C.F.R. § 111.4(d)(3).

<sup>2</sup> See e.g. MUR 7169 Compl. at 9. In MUR 7177, the sweeping allegation involved the "close and ongoing coordination occurring between the Colorado Democratic Party and Hillary for America." See MUR 7177 Compl. at 8.

<sup>3</sup> *Id.*

NOVEMBER

